

Todd M. Friedman (SBN 216752)  
Adrian R. Bacon (SBN 280332)  
LAW OFFICES OF ADRIAN R. BACON, P.C.  
21550 Oxnard St. Suite 780,  
Woodland Hills, CA 91367  
Phone: 877-206-4741  
Fax: 866-633-0228  
tfriedman@toddflaw.com  
abacon@toddflaw.com  
Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

ABANTE ROOTER AND PLUMBING )  
INC., individually and on behalf of all )  
others similarly situated, )  
Plaintiff, )

vs. )  
AMERICAN-AMICABLE LIFE )  
INSURANCE COMPANY OF )  
TEXAS, and DOES 1 through 10, )  
inclusive, and each of them, )  
Defendant. )

Case No.

[4:21-cv-00346-YGR](#)

**NOTICE OF VOLUNTARY  
DISMISSAL OF ACTION WITH  
PREJUDICE AS TO PLAINTIFF  
AND WITHOUT PREJUDICE AS  
TO THE PUTATIVE CLASS.**

NOW COMES THE PLAINTIFFS by and through their attorneys to respectfully  
move this Honorable Court to dismiss this matter with prejudice as to plaintiff  
and without prejudice as to the class. No Defendant has filed either an answer or  
a motion for summary judgment at this time, and no Court order is necessary  
pursuant to the Fed. R. Civ. P.

Respectfully submitted this 17th Day of July, 2021,

By: s/Adrian R. Bacon Esq.  
Adrian R. Bacon  
Attorney for Plaintiff

**CERTIFICATE OF SERVICE**

Filed electronically on July 17, 2021, with:

United States District Court CM/ECF system

Notification sent electronically on July 17, 2021, to:

To the Honorable Court, all parties and their Counsel of Record

By: s/Adrian R. Bacon Esq.  
Adrian R. Bacon  
Attorney for Plaintiff